CHARLES JAY WOLFF
v.
NEW HAMPSHIRE
DEPARTMENT OF
CORRECTIONS
CASE NUMBER - 1:06-CV-321

June 29th 2007

U.S. DISTRICT COURT
DISTRICT OF N.H.
FILED
2007 JUL -3 A 11:00

"MOTION"
"FOR EMERGENCY INJUNCTIVE RELIEF"

1. I HERE BY REQUEST THE UNITED STATES DISTRICT COURT OF NEW HAMPSHIRE TO ORDER THE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE TO PROVIDE MYSELF WITH A KOSHER DIET TO KEEP MYSELF IN GOOD HEALTH. TO INCLUDE KOSHER BEEF AND KOSHER POULTRY THAT I CAN CONSUME WITHOUT BE LIMITED. FLS AND TO PROVIDE MYSELF WITH VEGETABLES. I REQUEST THIS RELIEF.

2. I HERE BY REQUEST THE UNITED STATES DISTRICT COURT OF NEW HAMPSHIRE ORDER THE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE TO PROVIDE MYSELF WITH PROPER MEDICAL CARE AND PROPER MEDICATIONS. I REQUEST THIS RELIEF

REASONS: FOR ITEM NUMBER 1.

a. I HAVE HAD NO KOSHER BEEF OR KOSHER POULTRY NOR VEGETABLES IN OVER 2 MONTHS.
b. IN A SOLID FORM OF NUTRITION ONLY AN 7½ OZ OF GRAIN PRODUCT AND FRUIT AND ½ OZ OF CHIPS PER DAY.
c. ALL INMATES WHO CONSUME BEEF AND POULTRY RECEIVE THESE ANIMAL PRODUCT
d. ALL INMATES RECEIVE VEGETABLES
e. ITEMS C AND D VIOLATE MY 8TH AND 14TH ADMENDMENT OF OUR UNITED STATE CONSTITUTION.
f. I AM A DIABETIC WITH A HEART CONDITION.
G. I AM LOSING WEIGHT
H. I AM VERY ILL NOW AND VERY WEAK.
I. THE DEPARTMENT OF CORRECTIONS IS IN VIOLATION IN TOTAL OF NH. ADMIN RULES COR 301.03 WHICH MADE PER DENIED, DESCRIBE DAMIEN DALY

AND DOCTOR CELIA ENGLANDER MD. I GAVE A COPY TO IN HAND AND ALL HAS REFUSED TO COMPLY TO HELP ME.

REASON; FOR ITEM NUMBER 2

a. FROM OCTOBER 2ND 17TH 2006 MY PAIN MEDICATION WAS STOPPED TO FROM 2400 MG OF IBUPROFEN PER DAY WHICH WAS DISPENSED TO MY CELL 600 MG QID.

b. IN 2ND JANUARY DR CELIA ENGLANDER MD WROTE A RX FOR IBUPROFEN 400 MG TABLET "TAKE 1 TABLET AS NEEDED THREE TIMES A DAY" NO REFILLS WHILE LAST 90 DAYS THEY RUN OUT FOR 4 WEEKS

c. MY BACK, BOTH KNEES AND RIGHT CLAVICLE HAVE ARTHRITIS FROM THE INJURIES IN MILITARY SERVICE IN VIETNAM FROM 1968, 1969 AND 1970. AND FROM AND FOR SEVERAL INJURIES I RECEIVED AT THE NEW HAMPSHIRE STATE PRISON OR THE STATE OF NEW HAMPSHIRE CONCORD, NEW HAMPSHIRE 281 NORTH STATE OF THE PRISON 03301. MOST OF THE [illegible]

d. OTHER INMATES WITH MUCH LESS INJURIES RECEIVE MEDICATION TO CONTROL THEIR PAIN.

e. A VIOLATION OF MY 8TH AND 14TH AMENDMENT OF OUR UNITED STATES CONSTITUTION

F. MOST INMATES IN THE NEW HAMPSHIRE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE NEVER SERVED IN THE ARMED FORCES OF THE UNITED STATES WITH NO ONE WAS IN COMBAT LIKE I.

G. I REFUSE TO TAKE NARCOTICS EVEN THOUGH THIS TYPE OF MEDICATION WAS ORDERED TO MY/[illegible]

THE MEDICATION MAY BE GOOD FOR MYSELF BUT IT COULD CAUSE ME MORE HARM THAN GOOD AND I WENT INTO A MEDICAL STATE OF HARM.

H. DR. CELIA ENGLANDER MD HAS REFUSED TO PROVIDE MYSELF WITH PROPER PAIN MEDICATION.

I. THE DEPARTMENT OF CORRECTIONS PHARMACY OF THE STATE OF NEW HAMPSHIRE HAS REFUSED TO PROVIDE MYSELF WITH ANY [illegible] ORDERED BY DR CELIA ENGLANDER MD. AS A VIOLATION OF NH 627-C:2 ITEM III... "UNLESS THE PRESCRIBING PRACTITIONER SPECIFIES THAT THE BRAND DRUG IS MEDICALLY NECESSARY..." I AM ALSO ON [illegible] THE PAIN [illegible]!! NH 623-C:2 II FOR MEDICAL SERVICES FOR [illegible]

J. DR. CELIA ENGLANDER AND ORDERED THEM FOR MYSELF CHEWABLE ANTACID [illegible] TABLETS "CHEW ONE TABLET 3 TIMES DAILY 25 TABLETS TO LAST 25 DAYS FOR 1 YEAR.

K. ON 6-15-2007 I SENT A INMATE REQUEST SLIP TO THE PHARMACY IN [illegible] TO NIGHT I ONLY RECEIVED THE FOLLOWING MEDICATIONS [illegible] [illegible] I AM IN [illegible] WHEN WILL I RECEIVE THE [illegible] I RECEIVED THE PHARMACY REPLY BACK ON 6-15-2007 "THE NEXT ORDER [illegible] WILL BE FILLED CLOSER TO THE DUE DATE. [illegible] WERE FILLED 5-17-2007 FOR 1 MONTH SUPPLY."

L. ON 6-17-2007 I HAD NO NITROQUICK TABLETS LEFT I USED THE LAST ONE AND WROTE TO THE PHARMACY TO ASK THEM TO PLEASE SEND ME NITROQUICK TABLETS and I & never received a [illegible] & got sick with heartburn and spent a lot of time in my bed. I received my nitroglycerin tablet to help stop a heart attack on 6-26-07 and my chewable antacid tablet [illegible] on 6-28-2007 and have not received a reply of this motion.

M. I have had 6 appointments with Dr. Celia Englander M.D. I saw her twice for a total of 57 minutes. One time I waited for 2 hours and 45 minutes until I was told she was not in today. On 6-22-2007 I had an appointment with Dr. Celia Englander MD at 1500 hours (3pm). I passed in my appointment slip and my ID stating to the officer I have a 3 o'clock appointment with Dr. Englander and sat down in the waiting room with other inmates. At about 1520 hours (3:20) and Dr. Englander MD came out for her next patient. Dr. Englander MD saw me and told me I was late for my 2pm appointment. I told Dr. Englander my appointment slip states 1500 hours that time!! They will be [illegible] I said they [illegible] Dr. and that I am not going to argue with you. The correctional officer gave me my ID and I left.

N. Sick call is out of the question for any

TYPE OF PRESCRIPTION, INMATES SEE ONLY A NURSE WHO DO NOT HAVE A LICENSE TO WRITE AN RX (PRESCRIPTION) AND GIVE ME AN APPOINTMENT WITH A LICENSED PROVIDER TO WRITE AN RX (PRESCRIPTION) FOR MYSELF COULD TAKE UP TO 6 WEEKS AND IF PRESCRIBER [illegible] WILL NOT ORDER ME MEDICATION NO ONE IN THE INFIRMARY WILL ALSO NOT HELP.

O. I AM NO LONGER ABLE TO MAKE PHOTO COPIES UNTIL MY INMATE ACCOUNT IS IN THE POSITIVE. THIS COULD TAKE UP TO 6 MONTHS UNTIL I AM IN THE POSITIVE IN MY INMATE ACCOUNT

P. IF I EXPIRE, IT SHALL NOT BE BY MY HAND. IT SHALL BE BY THE INTENT OF THE EMPLOYEES OF THE NEW HAMPSHIRE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE TO PROTECT THEIR FRIENDS WHO ARE EMPLOYEES OF THE NEW NEW HAMPSHIRE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE FROM PUNISHMENT TO THEM BY THE UNITED STATES DISTRICT COURT OF NEW HAMPSHIRE FOR THEIR VIOLATIONS OF FEDERAL, STATE AND LOCAL LAWS TO INCLUDE THE BASIC LAW OF HUMAN COMPASSION.

Q. BECAUSE OF THE CONTINUED NEGLIGENCE OF ITEM NUMBERS 1 AND 2, I AM IN HARMS WAY.

RESPECTFULLY SUBMITTED
[signature]
CHARLES JAY WOLFE

I HERE BY CERTIFY THAT A COPY OF THE FOREGOING WAS MAILED TO ATTORNEY ANDREW B. LIVERNOIS ESQUIRE DEPARTMENT OF JUSTICE OF THE STATE

OF NEW HAMPSHIRE 33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301. BY MEANS
OF NEW HAMPSHIRE DEPARTMENT OF
CORRECTIONS PPD 5.26 THIS 29TH DAY
OF JUNE 2007.

DATE: JUNE 25TH 2007

NAME: WOLFF V. DEPARTMENT OF CORRECTION

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DOCUMENT NUMBER-10 321-PB